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NOTES OF CASES.

Suits In Forma Pauperis—Va. Code 1904, § 3538.—A federal statute provides that a citizen may “commence and prosecute to conclusion any such suit or action” without giving security if he file an affidavit of his poverty. In the case of *Bradford v. Southern Railway Co.*, 195 U. S. 443, the court decided that the plaintiff who was suing in forma pauperis and against whom a verdict had been rendered could not sue out a writ of error from the Circuit Court of Appeals until she had deposited security for the payment of the costs. In short, the court decided that the statute did not apply to writs of error. Our statute on the subject (Va. Code 1904, § 3538) provides that a poor person may be allowed by a court to sue or defend a suit therein without paying fees or costs, which language would seem to leave the whole matter in the discretion of the court wherein the suit was pending.

Is Christian Science the Practice of Medicine—Va. Code, 1904, § 1750.—In the case of *State v. Marble*, 73 N. E. 1063, the Supreme Court of Ohio upheld the conviction of a Christian Science healer for practicing medicine without a license. Our statute on the subject (§ 1750, Code) has recently been broadened with the intention of making it apply to the Christian Scientists. “Christian Science and the Law” is interestingly discussed in an article by Mr. Irving E. Campbell in 10 Va. Law Reg. 285.

Service of Process on Domestic Corporations—Va. Code 1904, §§ 897, 3220-5-7.—Section 3220 of the Code of Virginia relative to the issuance, direction, and execution of process presents a most curious result when applied to suits against domestic corporations in counties or corporations wherein the cause of action arose but wherein the principal office of the defendant company is not located and wherein there resides none of its officers upon whom service may be had. For instance, A sues a Norfolk corporation in the City of Richmond, wherein the cause of action arose. Section 3225 requires that service shall be made on any one of certain enumerated officers. Section 3227 requires that such process shall be served on such officer in the county or corporation wherein he resides, or his place of business, or the principal office of the corporation is located. Section 3220 requires that such a process shall be directed only to the officer of the county or corporation wherein the action is brought. Therefore in this case the process must be directed to the sheriff of the City of Richmond, but it can not be served by him because it is provided by Section 897 that every officer to whom any process may be lawfully directed shall execute the same within his county or corporation. Nor can the process be served by the sergeant of the City of Norfolk,